

From: [Adam Slater](#)
To: [Valsartan PEC](#)
Cc: [sgoldberg@duanemorris.com](#); [Poletto, Janet L.](#); [Priselac, Jessica](#); [Brancato, Alexia Renee](#); [Clem C. Trischler](#); [CohenL@gtlaw.com](#); [valsartan@csdisco.com](#)
Subject: RE: In re Valsartan, Losartan, and Irbesartan Prod. Liab. Litigation - MDL No. 2875
Date: Friday, October 2, 2020 3:37:56 PM

Hi Jessica:

I am writing with regard to the Aurobindo Privilege Log produced on October 1, 2020. There appear to be some issues with the log that we would like to remedy, and with other defense counsel on this email, our understanding and expectations is being shared with them as well. The issues include: (1) the from and to columns only reference one sender and one recipient, we want to make sure that all people who sent or received an email are listed by name, with attorneys specifically identified, and this includes those cc'd, who should be indicated and named in a separate column so that we can tell who is the attorney at issue, and was this person a sender, recipient, or just a cc. In addition, the subject section provides cursory headings as to the subject, which are not sufficient to allow Plaintiffs to fairly assess whether a privilege has been properly invoked.

Please let us know if you agree to provide a more detailed privilege log. If not, we reserve the right to present this issue to the Court. If you want to discuss please let us know.

Thank you,

Adam Slater

From: Jessica Heinz <JHeinz@c-wlaw.com>
Sent: Thursday, October 01, 2020 4:19 PM
To: valpec@kirtlandpackard.com
Cc: sgoldberg@duanemorris.com; Poletto, Janet L. <JPoletto@hkmpp.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Brancato, Alexia Renee <alexia.brancato@kirkland.com>; Clem C. Trischler <CCT@Pietragallo.com>; CohenL@gtlaw.com; valsartan@csdisco.com
Subject: In re Valsartan, Losartan, and Irbesartan Prod. Liab. Litigation - MDL No. 2875

Counsel,

Please see the attached correspondence with enclosures.

Sincerely,
Jessica

JESSICA M. HEINZ | Partner

CIPRIANI & WERNER PC

450 SENTRY PARKWAY, SUITE 200 | BLUE BELL, PA 19422

(610) 567-0700 (MAIN) | www.c-wlaw.com
(610) 862-1929 (DIRECT) | jheinz@c-wlaw.com

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Cipriani & Werner, P.C. has implemented a full-spectrum approach to the COVID-19 situation.

Please click on one of the red “COVID-19 Resource Center” hot links on the home page of our website for complete access to our multi-disciplinary articles and updates in order to stay current on the changing legal landscape as it responds to COVID-19. To go directly to the COVID-19 Resource Center click <https://www.c-wlaw.com/>

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PRIVILEGE LOG

(Updated 10/1/20)

By Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC
In re Valsartan, Losartan, and Irbesartan Products Liability, No. 19-md-2875

DATE	TYPE	FROM	TO	SUBJECT	PRIVILEGE(S)	BATES
March 5, 2020	.PDF	Steve Lucas	NJ District Recall Coordinator	Recall Update	Withheld – Other Products	Auro-MDL 2875-0080271
April 20, 2020	Email	Steve Lucas	In-house counsel	Recall Update	Attorney-client privilege	Auro-MDL 2875-0080278
N/A	Excel	N/A	N/A	Sales and Pricing data	Withheld – Other Product	Auro-MDL 2875-0080292
January 21, 2020	Emails	Counsel	In-house counsel	MDL 2875	Attorney-client privilege	Auro-MDL 2875-0084557
January 20, 2020	Emails	Counsel	In-house counsel	MDL 2875	Attorney-client privilege	Auro-MDL 2875-0084558
December 28, 2018	Email	Jeff Jackowski	In-house counsel	Valsartan recall	Attorney-client privilege	Auro-MDL 2875-0084615
May 13, 2019	Email with attachments	Daniel Burns	In-house counsel	MDL 2875	Attorney-client privilege and work product	Auro-MDL 2875-0086439 to Auro-MDL 2875-0086490
August 23, 2019	Email with attachment	Pharmacovigilance (Steve Lucas' custodial file)	In-house counsel	MDL 2875	Attorney-client privilege and work product	Auro-MDL 2875-0087311 to Auro-MDL 2875-0087312
August 23, 2019	Emails with attachment	Pharmacovigilance (Steve Lucas' custodial file)	In-house counsel	MDL 2875	Attorney-client privilege and work product	Auro-MDL 2875-0087369 to Auro-MDL 2875-0087370
November 12, 2019	Email with attachment	Pharmacovigilance (Jeff Jackowski's custodial file)	In-house counsel	MDL 2875	Attorney-client privilege and work product	Auro-MDL 2875-0088700 to Auro-MDL 2875-0088701
November 6, 2019	Email with attachment	Pharmacovigilance (Jeff Jackowski's custodial file)	Jasleen Gupta	MDL 2875	Work product	Auro-MDL 2875-0088940 to Auro-MDL 2875-0088941